## UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

OSCAR YANES, GAGIK MKRTCHIAN, and WENDELL BAEZ LOPEZ, on behalf of themselves and all those similarly situated,

Petitioners-Plaintiffs,

-V.-

DANIEL W. MARTIN, Warden, Donald W. Wyatt Detention Facility; CHAD F. WOLF, Acting Secretary, U.S. Department of Homeland Security; MATTHEW T. ALBENCE, Acting Director, U.S. Immigration and Customs Enforcement; TODD M. LYONS, Acting Field Office Director, U.S. Immigration and Customs Enforcement; and CENTRAL FALLS DETENTION FACILITY CORPORATION.

Civil Action No. 20-CV-216-MSM-PAS

Respondents-Defendants.

## NOTICE OF FILING OF SUPPLEMENTAL BAIL SUBMISSIONS REGARDING DETAINEE LASCELLES CLUE

The Federal Respondents respectfully submit the attached Exhibits, which are additional, underlying materials relevant to the Court's determination of whether bail is appropriate for detainee Lascelles Clue, currently scheduled for a bail hearing on Thursday, June 11, 2020. The Federal Respondents are providing these materials as soon as practicable so that they are available to the Court and to counsel for Petitioners in advance of this bail hearings for this detainee, and respectfully request that the Court deem them timely filed, *nunc pro tunc*, in supplementation of their opposition (Docket No. 72).

Attachment:	Description of Exhibit
1	Clue Exhibit A – Immigration Records
2	Clue Exhibit B – Criminal Records
3	Clue Exhibit C – Police Reports

Dated: Providence, Rhode Island June 10, 2020 Respectfully submitted,

AARON L. WEISMAN United States Attorney

By: /s/ Bethany N. Wong

ZACHARY A. CUNHA (Bar No. 7855) RICHARD B. MYRUS BETHANY N. WONG Assistant U.S. Attorneys 50 Kennedy Plaza, 8<sup>th</sup> Floor

Providence, RI 02903

Tel: (401) 709-5040 / Fax: (401) 709-5001

Zachary.Cunha@usdoj.gov

## **CERTFICATE OF SERVICE**

I hereby certify that, on June 10, 2020, I caused the foregoing document to be filed by means of this Court's Electronic Case Filing (ECF) system, thereby serving it upon all registered users in accordance with Federal Rule of Civil Procedure 5(b)(2)(E) and Local Rules Gen 305 and 309(b).

By: <u>/s/ Bethany N. Wong</u>

Bethany N. Wong

Assistant United States Attorney